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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte

EX PARTE OR LATE FILED

William F. Caton, Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, DC 20554

Re: Ex Parte Meeting
CC Docket No. 96-254

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

This is to advise you that earlier today, representatives of the Telecommunications Industry Association (TIA) met with the staff of the Common Carrier Bureau's Network Services Division to discuss TIA's position with respect to various issues addressed in its prior submissions in the above-captioned proceeding. FCC staff members participating in the meeting included Anna Gomez, Leslie Selzer, Matthew Nagler, William Howden, Gregory Cooke, and Jonathan Gelchinsky. Representing TIA at the meeting were TIA's Director of Government Relations, Grant Seiffert, TIA's Vice-President of Standards and Technology, Dan Bart, Maryanne McCormick of Corning, Inc., Tom Cohen of Davison Cohen & Company, Brett Wilson of Rockwell International Corporation, and the undersigned. The attached documents describe the substance of TIA's presentation.

Respectfully submitted,


John L. McGrew

cc: Anna Gomez
Leslie J. Selzer
Matthew G. Nagler
William E. Howden
Gregory M. Cooke
Jonathan Gelchinsky
Secretary (two copies)

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SUMMARY OF TIA POSITION RE/ADEQUACY
OF CURRENT FCC PART 51 RULES TO ADDRESS
SECTION 273 INFORMATION DISCLOSURE REQUIREMENTS

- **General:** Section 273(c) imposes information disclosure obligations on the BOCs that are separate and in a number of respects distinguishable from the disclosure obligations imposed on all ILECs under Section 251(c)(5). TIA supports harmonization of the Rules to be established in this proceeding with those already adopted in Part 51 of the Commission's rules, to the extent that this objective can be achieved in a manner consistent with the language and purposes of Section 273(c). In developing proposed regulations implementing Section 273(c), TIA has adopted language identical to or consistent with the existing Part 51 Rules wherever possible. TIA also would support allowing the BOCs to meet their independent obligations to disclose information concerning changes to their networks in accordance with the provisions of Section 273(c) and 251(c)(5) on a consolidated basis, i.e., through a single filing with the Commission which contains all of the information needed to satisfy the requirements of both sections of the statute.

- **Nature/Scope of Disclosure Requirement [47 C.F.R. § 51.325(a)-(b)]:** Part 51 language is inadequate; the FCC needs to craft a rule that reflects differences between Section 251 and Section 273 with respect to subject entities (i.e., BOCs, not ILECs), purpose, intended beneficiaries, and the nature and scope of information required to be disclosed. See TIA Proposed Rule § 53.303(a). Pursuant to Section 273(c)(1), BOCs must "maintain and file" required information with the FCC, in contrast to Section 251(c)(5), which merely requires ILECs to provide "public notice." Part 51 rules also are limited to disclosure of network changes, and therefore are inadequate to satisfy the "baseline" information disclosure requirements of Section 273(c).

[Note: With respect to "baseline" information, in order to minimize the burden imposed on the BOCs and the Commission, TIA is willing to support an approach which allows this obligation to be satisfied through a filing with the Commission which identifies all relevant documents with specificity (including, where applicable, the title, author/publisher, and version number/issue date of the document, together with a brief summary of its contents) and provides the name/address of a contact person that will make the documents themselves available upon request, in an appropriate format and in a timely manner.]

- **Non-discrimination Requirements [47 C.F.R. § 51.325(c)]:** At a minimum, language used in Part 51 would need to be revised and supplemented to reflect Section 273(c) requirements. TIA's Proposed Rule § 53.303(b)(1) is designed to implement Section 273(c)(2), barring advance disclosure of information that must be filed with the FCC pursuant to Section 272(c)(1). Language of § 51.325(c), with certain revisions, could be useful for this purpose as well. TIA's Proposed Rule § 53.303(b)(2) establishes an additional requirement, implementing Section 273(c) and related provisions, which

directs BOCs to make information relating to their network protocols and technical requirements (and "possible changes thereto") which has not already been publicly disclosed available to all manufacturers on a non-discriminatory basis, i.e., on equal terms and conditions.

- **Timing of Disclosure [47 C.F.R. § 51.331]:** TIA's Proposed Rule § 53.303(c)(1)-(2) adopts language with respect to the timing of BOC disclosure of planned network changes which tracks that adopted in § 51.331(a), with the exception of the "short-term" (i.e., less than 6 months) notice option described in subsection (a)(2) and in § 51.333. Given the lead time typically associated with the design (or redesign) of telecom equipment and CPE, TIA believes that at least 6 months advance notice should be required for changes affecting the design, interconnection, and/or interoperation of equipment used in or connected to BOC networks, in order to prevent (or at least minimize) harm to competition and consumers of products affected by a particular network change.

TIA's Proposed Rule § 53.303(c)(3) incorporates definitions of "make/buy point," "product," and "definite decision" similar to those incorporated in § 51.303(b), with certain revisions designed to reflect differences in the nature and purposes of the Section 251 and 273 disclosure requirements. TIA's Proposed Rule § 53.303(c)(4) includes additional language clarifying that the above-described timing rules do not apply to disclosures required under the non-discrimination requirements established pursuant to Section 273(c) and other relevant provisions, e.g., Section 272(c)(1). See TIA Proposed Rule § 53.303(b)(2) and (c)(4).

- **Method of Disclosure [47 C.F.R. § 51.329]:** Part 51 rules are appropriate, with certain adjustments. Consistent with the requirements of Section 273(c)(1), TIA's proposed rules would direct BOCs in all cases to file the requisite information with the FCC. TIA would allow disclosures through industry fora and publications or the BOC's Internet site, as described in § 51.329(a)(2), but only as an additional (rather than alternative) method of disclosure. The filing requirements described in § 53.303(e) of TIA's Proposed Rules are virtually identical to those established in Section 51.329(c), and require submission of paper copies, as well as a diskette copy, to the FCC. While not specifically addressed in TIA's proposed rules, the "updating" requirement included in Section 51.329(b) also can and should be incorporated in the rules implementing the Section 273(c) disclosure requirements.

[Note: The paper/diskette copies filed with the Commission should include, at a minimum, the information concerning planned BOC network changes described below. In order to reduce the administrative burden in a manner consistent with the filing requirements of Section 273(c), TIC proposes that in lieu of paper/diskette filings, the Commission could allow more detailed information concerning changes (e.g., the text of any relevant technical standards) be filed, maintained, and accessed electronically, at a central site controlled by the FCC or some other neutral party designated by the Commission. If this approach is adopted, the Commission should undertake to review its effectiveness at the end of an initial period (e.g., 1-2 years) and make whatever

adjustments may be required to ensure that manufacturers have appropriate, timely access to all relevant information concerning BOC network changes.]

- **Content of Disclosure [47 C.F.R. § 51.327]:** TIA's Proposed Rule § 53.303(d) establishes format/content requirements for BOC reports of planned network changes that closely track those established in § 51.327, which provides that disclosures must, at a minimum, include: 1) carrier's name/address; 2) name/telephone number of contact person that can provide additional information concerning planned changes; 3) implementation date; 4) location(s) at which changes will occur; 5) description of type of changes planned; and 6) a description of the "reasonably foreseeable impact" of the planned changes. Descriptions of planned changes must include, but are not limited to, references to technical specifications, protocols, and standards regarding transmission, signalling, routing and facility assignment, as well as "references to technical standards that would be applicable to any technologies or equipment." TIA believes that it is particularly important that the BOC be required, in describing their network protocols and technical requirements (and changes thereto), to specifically note any deviations from previously-published standards or generic requirements developed by accredited and/or non-accredited standards development organizations.

[Note: As the attached comparison indicates, the nature/scope of BOC network-related information required under Section 273 may differ from that which ILECs are required to disclose pursuant to Section 251(c)(5). In addition, certain of the information required under the Part 51 rules (e.g., location of changes) may be less relevant from a manufacturer's perspective.]

- **Treatment of Confidential/Proprietary Information [47 C.F.R. § 51.335]:** TIA's Proposed Rule § 53.303(f) includes provisions with respect to the treatment of confidential/proprietary information that are virtually identical to those contained in the Part 51 rules.

Comparison of TIA and Bellcore Positions
Re/Key Section 273(d) Issues

Bellcore	TIA
<p>on of proposed sale to SAIC, Bellcore will no longer be affiliated and will therefore be free to manufacture, subject to the safeguards section 273(d)(2)-(3).</p> <p>r more of the BOCs continues to exercise "control" over Bellcore is the issue of Bellcore's ability to manufacture post-sale. The "affiliate" adopted in Section 273(d)(8)(A) addresses only voting, not direct or indirect "control." Assuming <u>arguendo</u> that this issue BOCs will not have control over Bellcore's activities. Accordingly, reason to engage in protracted inquiry on the Bellcore sale."</p>	<ul style="list-style-type: none"> • TIA believes that it is at best premature to conclude on the basis of the current record that the proposed sale to SAIC will operate to free Bellcore from the manufacturing restriction imposed under Section 273(d)(1). The Commission should defer making a determination on this issue until full and complete information, w/r/t the terms and conditions of the proposed sale and the future relationships between and among the BOCs, Bellcore, SAIC, and the new National Telecommunications Alliance, is made available for review and public comment, • While Section 273(d)(8)(A) imposes a lower ownership threshold for purposes of the Section 273(d)(1) manufacturing prohibition, it does not alter the "control" element of the definition of "affiliate" adopted in Section 3 of the Act. Accordingly, it is <u>not</u> sufficient to look only at whether the BOCs retain ownership interests in Bellcore. Factors relevant to a determination as to whether <u>de jure</u> or <u>de facto</u> control exists include the specific terms of the SAIC sale and related agreements, the volume and percentage of Bellcore's revenues attributable to its dealings with the BOCs, the nature/scope of any long-term contracts between the BOCs and Bellcore, and any rights retained by the BOCs with respect to Bellcore's activities or assets, <u>e.g.</u>, intellectual property created in the course of its RBOC-funded research activities.
<p>des that the separate affiliate requirements and other safeguards Section 273(d)(3) will apply to its manufacturing activities, once it is engage in such activities. However, Bellcore asserts that this section preclude either "certification" or "manufacturing" activities in a separate affiliate.</p> <p>s that there should be no limitation on the ability of an "expert" consulting, generic requirements, and/or certification operations, areas involving "cutting-edge technologies," to make his/her contribution to Bellcore manufacturing operations as well.</p>	<ul style="list-style-type: none"> • TIA disagrees with Bellcore's assertion that Section 273(d)(3) allows it to choose whether to place manufacturing or certification activities in a separate affiliate. The language adopted in Section 273(d)(3)(A)-(C) clearly contemplates that it is the certifying entity's <u>manufacturing</u> activities that must be conducted through a separate affiliate. • TIA also opposes Bellcore's suggestion that it should be allowed to utilize "experts" employed in its standards/certification activities in connection with its manufacturing activities as well. Such sharing of personnel would be wholly inconsistent with the statutory requirement that the manufacturing affiliate have "segregated facilities and separate employees." Indeed, the potential for abuse and the importance of maintaining strict separation is greatest in areas involving new, "cutting-edge" technologies.

Bellcore**TIA**

ts that it is "inappropriate and inconsistent with the statutory plan to s or pricing of Bellcore's contracts with its customers." However, in concerns expressed by TIA and other commenters with respect to "adding" of GR funding contracts, Bellcore has developed a procedure for participants in large projects (i.e., those where the fee will exceed \$100,000) to participate in an initial "try before you buy" phase, involving payment of a small fee and no other charges, before committing to a more costly detailed development agreement. To reduce the burden on smaller companies, Bellcore has developed a Generic Requirements Participation Agreement (GRPA) to give funding participants with gross annual revenues of \$40 million or less a "small business

ts that the adoption of TIA's one participant/one vote proposal, with a "sliding-scale" fee structure, "could lead to participation by large participants who have no strong interest in the particular generic requirements and thereby slow or disrupt development of the GR. Nonetheless, Bellcore has revised its current GRPA to give each participant paying the specified

es that the standard for relief from the requirements of Section 273(d)(4) is satisfied so long as there is another entity that is "engaged in the same work" and that "has the capability of doing what Bellcore is doing."

uses the imposition of a "burden of production" on an entity that is pursuant to Section 237(d)(6), asserting that the information needed to satisfy the obligation "would be proprietary to others and not available to

- Consistent with the requirements of Section 273(d)(4), the Commission should make it clear that the funding and participation arrangements adopted by Bellcore and other non-accredited standards development organizations must be reasonable, non-discriminatory, and non-exclusionary. In this regard, TIA urges the use of a sliding-scale approach to funding, a "one vote per company" rule, and a requirement that prospective participants be given the opportunity to enter/exit and fund the project at various stages.

- While certain of the changes reflected in Bellcore's revised GRPA (e.g., the "try before you buy" option, small business discount, one vote per funding party rule) provide at least a partial response to concerns raised by TIA and others, additional areas of concern (e.g., proxy voting) remain. TIA urges the Commission to take steps to ensure that the changes made to date, as well as any further improvements in the terms of the GRPA, are not just temporary accommodations designed to assuage concerns w/r/t Bellcore's GR procedures during the pendency of the Commission's rulemaking, but rather reflect an ongoing, permanent commitment by Bellcore to maintain funding and participation arrangements that are consistent with the provisions and underlying purposes of Section 273(d)(4).

- Bellcore's proposed construction of the standard established in Section 273(d)(6) for termination of the requirements of subsections (d)(3) and (d)(4) clearly conflicts with the express requirements of the statute and must be rejected. The fact that another entity has the "capability of doing what Bellcore is doing" plainly is not a sufficient basis for relief under the statute, which specifically requires a showing that there are other entities providing "commercially viable alternatives" which are in fact accepted and used within the industry as an alternative, not a supplement, to the applicant's standards, generic requirements, or certification services.

- Parties seeking relief under Section 273(d)(6) properly bear the burden of demonstrating that such action is appropriate. Accordingly, they should be required to provide procurement documents or other information demonstrating that "commercially viable alternatives" exist and are in fact providing true alternatives to the applicant's standard, generic requirement, or certification service, i.e., that the alternative is used in lieu of, rather than in addition to, the applicant's.

Comparison of Section 251 and 273
Information Disclosure Requirements

Section 251(c)(5)	Section 273(c)	Comments
<p>"ambient local exchange carrier" (ILEC)</p> <p style="text-align: center;">[§ 251(c)(5)]</p>	<p>"Each Bell Operating Company" (BOC)</p> <p style="text-align: center;">[§ 273(c)(1)]</p>	<ul style="list-style-type: none"> • While Section 273(c) applies "on its face" to <u>all</u> BOCs (see NPRM, ¶ 17), SBC argues only BOCs "authorized to manufacture" under Section 273(a) are covered; other RBOCs contend that Section 273(c) requirements apply only to BOCs that are actually engaged in manufacturing.
<p>competition in telecommunications and on services; facilitate interconnection, availability of competing service providers' facilities, with ILEC networks.</p> <p>[See 2nd R&O, CC Docket 96-98, ¶ 171]</p>	<p>Promote competition, "level playing field" in manufacture of telecom equipment and CPE; ensure availability of information essential to the design of equipment for use in or connection to BOC networks on timely, non-discriminatory basis.</p> <p style="text-align: center;">[§ 273(c)(1)-(3)]</p> <p>Ensure that interconnecting local carriers receive timely information on a BOC's planned deployment of telecommunications equipment.</p> <p style="text-align: center;">[§ 273(c)(4)]</p>	<ul style="list-style-type: none"> • Issues re/nature and scope of disclosure requirements will/should be considered and resolved in light of each provision's intended purpose. • TIA's proposed rules do not address BOC disclosure obligations under Section 273(c)(4).
<p>ing telecom and information service providers.</p> <p>[See 2nd R&O, CC Docket 96-98, ¶ 176]</p>	<p>Manufacturers of telecom equipment/CPE.</p> <p style="text-align: center;">[273(c)(1)-(3)]</p> <p>Interconnecting carriers providing telephone exchange service.</p> <p style="text-align: center;">[§ 273(c)(4)]</p>	<ul style="list-style-type: none"> • Access to information provided pursuant to Section 251(c)(5) and 273(c)(1)-(3) is not limited to intended beneficiaries.
<p>must provide "reasonable public notice" of the : described below:</p>	<p>BOC must "maintain and file with the Commission" the following information:</p>	<ul style="list-style-type: none"> • FCC rules implementing Section 251(c)(5) permit, but do not require that "public notice" be provided through a filing with the Commission. <p style="text-align: right;">[See 47 C.F.R. § 51.329(a)]</p>

Section 251(c)(5)	Section 273(c)	Comments
<p>Section 251(c)(5) requires ILEC disclosure of certain network changes (see below), but does not require disclosure of "baseline" information on ILEC networks.</p> <p>Information is in information necessary for transmission/routing services using ILEC's facilities/networks; and</p> <p>Other changes that would affect the interoperability of facilities and networks.</p> <p>BOC rules clarify that the Section 251(c)(5) disclosure requirement encompasses any network change that would affect 1) a competing service provider's service or ability to provide service, or 2) the ILEC's ability to provide service with other service providers.</p> <p>[47 C.F.R. § 51.325(a)]</p> <p>Disclosures of changes that would trigger public disclosure are required under Section 251(c)(5) "include, but are not limited to, changes that affect: transmission; signaling; call routing; network configuration; logical interfaces; electronic interfaces; data elements; and other elements that support ordering, provisioning, maintenance and billing." (FCC's Order emphasizes that this list is not exclusive but exemplary. . . .)</p> <p>[2nd R&O, CC Docket No. 96-98, ¶ 182]</p>	<ul style="list-style-type: none"> • "full and complete" information w/r/t the protocols and technical requirements for connection with/use of BOC telephone exchange service facilities; and • any material changes or planned changes to BOC network protocols and technical requirements, and the schedule for implementation of such changes. <p>[§ 273(c)(1)]</p> <p>In addition, pursuant to Section 273(c)(4), each BOC must provide timely information to interconnecting carriers that provide telephone exchange service concerning the BOC's planned deployment of telecommunications equipment.</p> <p>[§ 273(c)(4)]</p>	<ul style="list-style-type: none"> • Differences in the language and purposes of Section 251(c) and 273(c) suggest that the nature and scope of network changes covered by these two provisions may differ. While certain network changes affect both competing service providers and manufacturers of the equipment used to provide competing services, there may be other types of changes in an ILEC's network that do <u>not</u> affect the interconnection or interoperability of competing service providers but that <u>do</u> have an impact on the ability of manufacturers to design products for use within, or in connection with the ILEC's network. <p>For example, certain changes to a BOC's network protocols/technical requirements may have a significant impact on the design of equipment which is or may be connected to the BOC's network for use in its provision of particular network elements or services, but may not affect the interconnection/interoperability of other carriers seeking to utilize the BOC's network element or service. Disclosure of such changes is required pursuant to Section 273(c), irrespective of whether the BOC also is required to provide public notice of the change pursuant to Section 251(c)(5).</p> <p>[<u>Note</u>: A BOC's failure to make information concerning changes to its network available to all manufacturers at the same time and on equal terms and conditions would constitute a violation of the BOC's general non-discrimination obligation under Section 272(c)(1), where such information has been disclosed to the BOC's manufacturing affiliate. Preferential disclosures of BOC network change information also conflict with Section 273(c)'s non-discrimination requirement (see discussion below) as well as the procurement provisions of Section 273(e), to the extent that such practices limit the ability of other manufacturers to manufacture and market products affected by such changes to the BOCs.]</p>

Section 251(c)(5)	Section 273(c)	Comments
<p>tion 251(c)(5) does not include an explicit non-notice requirement, FCC rules provide that until notice is given, an ILEC may not disclose to affiliates, separated affiliates, or unaffiliated (including actual or potential competing service providers or competitors) information about planned changes."</p> <p>[47 C.F.R. § 51.325(c)]</p>	<ul style="list-style-type: none"> • Section 273(c)(2) provides that a BOC "shall not disclose" information required to be filed under Section 273(c)(1) unless it has been filed "promptly" with the FCC. In its NPRM [¶ 26], the FCC interprets this requirement to mean that a BOC may not disclose information that falls within the scope of Section 273(c)(1) until it has been filed with the Commission. • Section 273(c)(3) gives the FCC authority to prescribe such additional rules as may be necessary to ensure that all manufacturers have access to information with respect to BOC network protocols and technical requirements that a BOC makes available to "any [BOC] manufacturing affiliate or any unaffiliated manufacturer." <p>The Commission's NPRM (¶ 28) notes that the FCC's existing network disclosure rules "have not, until now, focused specifically on the needs of manufacturers" for information affecting the design of equipment, and invites comment on "whether regulations in addition to those in place or to be adopted pursuant to Section 273(c)(1) are needed to assure that manufacturers have access to the necessary information. . . ."</p>	<ul style="list-style-type: none"> • TIA's proposed rules would explicitly require a BOC that discloses information relating to protocols/technical requirements for connection with/use of its telephone exchange service facilities, "or possible changes thereto," to <u>any</u> manufacturing affiliate or unaffiliated manufacturer (other than information that has been publicly disclosed) to make such information "immediately available to <u>all</u> manufacturers on a non-discriminatory basis, <u>i.e.</u>, on equal terms and conditions." [Emphasis added] <p>[Note: The non-discrimination requirements of sections 272(c)(1) and 273(e), together with the supplemental authority granted under Section 273(g), provide additional support for TIA's proposed rule.]</p>
<p>† 51 rules require ILEC to provide public notice of planned changes at the "make/buy" point, but at 12 months before implementation <u>except</u>:</p> <p>where planned changes can be implemented within 12 months of make/buy point, public notice must be given at make/buy point, but at least 6 months before implementation.</p> <p>where planned changes can be implemented within 6 months of make/buy point, notice can be provided pursuant to special "short-term" notice procedures.</p>	<ul style="list-style-type: none"> • FCC has not yet adopted rules implementing Section 273(c) requirement that BOCs report planned network changes "promptly" to the Commission. 	<ul style="list-style-type: none"> • TIA's proposed rules would parallel FCC Computer III timing rules, <u>i.e.</u>, notification at "make/buy" point, but at least 12 months before implementation, unless changes can be made within 12 months, in which case public notice must be given at make/buy, but at least 6 months before implementation. Use of "short notice" procedure (<u>i.e.</u>, less than 6 months notice) would <u>not</u> be permitted.

Section 251(c)(5)	Section 273(c)	Comments
<p data-bbox="136 275 421 306">[47 C.F.R. § 51.332(a)]</p> <p data-bbox="107 311 645 378">allow ILECs to use one of the following two provide "public notice" of network changes:</p> <p data-bbox="91 419 405 449">public notice with the FCC</p> <p data-bbox="91 491 562 593">notice through industry fora, industry publications, or the carrier's publicly-accessible Web site.</p> <p data-bbox="91 634 645 808">If the ILEC uses a method other than filing a notice with the FCC, it must file a certification with the Commission that identifies proposed changes, that public notice has been given, and identifies the nature of the changed information and how it can be obtained.</p> <p data-bbox="136 885 421 915">[47 C.F.R. § 51.329(a)]</p> <p data-bbox="91 956 645 1059">The carrier must keep notices available for public inspection until the planned change is implemented, and if necessary, must take steps to keep information complete, accurate, and up-to-date.</p> <p data-bbox="136 1136 421 1166">[47 C.F.R. § 51.329(b)]</p> <p data-bbox="91 1207 645 1345">Public notices and certifications must be labeled as such. Two paper copies must be filed with the FCC: one with the FCC's office, with one paper and one diskette copy to the Chief, Network Services Division.</p> <p data-bbox="136 1387 421 1417">[47 C.F.R. § 51.329(c)]</p>	<p data-bbox="680 311 1272 449">• FCC has yet to adopt rules with respect to the form/method of BOC disclosures under Section 273(c)(1), which by statute must be filed with the Commission.</p>	<p data-bbox="1352 311 2022 485">• TIA's proposed rules would require BOCs to file disclosures pursuant to Section 273(c)(1) with the FCC, while allowing electronic notification of network changes (e.g., through Web sites) as an <u>additional</u> (rather than alternative) means of disclosure.</p> <p data-bbox="1352 1207 2022 1345">• TIA's proposed filing requirements are similar to Part 51 rules for FCC filings, i.e., two paper copies to the Secretary's Office; one paper and one diskette copy to the Chief, Network Services Division.</p>

Section 251(c)(5)	Section 273(c)	Comments
<p>Public notice of planned network changes must, at a minimum, include:</p> <ul style="list-style-type: none"> Carrier's name/address Name/telephone number of contact person that can provide additional information Implementation date Location(s) of changes Description of type of changes, including (but not limited to) "references to technical specifications, protocols, and standards regarding transmission, signaling, routing, and facility assignment, as well as references to technical standards that would be applicable to any new technologies or equipment or may otherwise affect interconnection"; and Description of the "reasonably foreseeable impact" of the planned changes <p>[47 C.F.R. § 51.327(a)]</p>	<ul style="list-style-type: none"> FCC rules re/required content of Section 273(c) disclosures still to be determined. 	<ul style="list-style-type: none"> TIA's proposed rules would require the submission of information (i.e., "baseline" information <u>and</u> planned changes) that includes, at a minimum, full and complete information concerning BOC network protocols and other technical requirements for connection with and use of "any or all points of interconnection within the BOC's network, as well as any and all BOC network elements, including information relating to 1) connections between BOC network elements, and 2) connections between customer premises equipment and BOC network elements." <p>[<u>Note</u>: Information required by manufacturers would appear to extend to information relating to interfaces and other technical requirements for particular hardware/software products which collectively comprise a particular BOC network element. See discussion of "Network Changes" above. The information required to design products for use in or connection to BOC network elements therefore may encompass information beyond that required by a competing carrier seeking to interconnect and interoperate with a BOC's network, or some portion thereof.]</p> <ul style="list-style-type: none"> TIA's proposed rules also would require planned network changes to be disclosed pursuant to format/content requirements similar to those adopted in the Part 51 rules (e.g., carrier name/address, name/telephone number of contact person, implementation date, location, description of type of changes and "reasonably foreseeable impact" of such changes). <p>[<u>Note</u>: TIA believes it is particularly important that the BOCs be required, in describing their network protocols and technical requirements (and changes thereto), to specifically note any deviations from previously-published standards or generic</p>

Section 251(c)(5)	Section 273(c)	Comments
<p>statute and rules do not address, FCC has indicated market and technical trials are not subject to "the notice under Section 253(c)(5)." Notice of trials may be provided, as needed, on a private, contractual basis.</p> <p>2nd R&O, CC Docket No. 96-98, ¶ 260]</p>	<ul style="list-style-type: none"> • Statute does not address • FCC's NPRM (¶ 19) invited comment on whether "bona fide equipment trials" should be exempt from Section 273(c)(1) disclosure requirements. 	<p>requirements developed by accredited and/or non-accredited standards development organizations.]</p> <ul style="list-style-type: none"> • TIA has supported adoption of an exemption which protects manufacturers' proprietary information during the course of market or technical trials on a BOC network. <p>[Note: The proposed exemption should not be allowed to serve as a pretext for preferential BOC disclosures of information that affects the ability of manufacturers to design and sell equipment for use in or connection to the BOC network. Accordingly, TIA urges that BOCs be required to advise the FCC and provide public notice of the commencement of network trials involving BOC "affiliates" or other "related persons."]</p>
<p>rules provide that if information that is otherwise confidential or proprietary, the notice must include a statement that the ILEC will make the information available to those signing a non-disclosure agreement.</p> <p>[47 C.F.R. § 51.335(a)]</p> <p>on ILEC's receipt of a competing service provider's request for disclosure of confidential/proprietary information, the applicable public notice period will be tolled until the parties agree on a non-disclosure agreement. In such cases, the ILEC must revise its public notice to state that the notice period is tolled and, once the disclosure agreement is finalized, specify a new notice period.</p> <p>[47 C.F.R. § 51.335(b)]</p>	<ul style="list-style-type: none"> • Statute does not address. 	<ul style="list-style-type: none"> • TIA's proposed rules include provisions similar to those adopted in Part 51 that provide for the use of appropriate non-disclosure agreements in cases where Section 273(c) requires disclosure of confidential or proprietary information. <p>[Note: In such instances, TIA has taken the position that any license fees or conditions imposed on access to information disclosed pursuant to Section 273(c) must be reasonable and applied on a non-discriminatory basis. TIA also has asked the FCC to make it clear that the confidential or proprietary status of information otherwise subject to disclosure cannot be used to shield a BOC from compliance with the statute.]</p>

TIA EX PARTE PRESENTATION
Summary of Key Section 273(e) Procurement Issues
(CC Docket No. 96-254)

- Scope of Application - The procurement provisions of Section 273(e) apply to all BOCs, not just those authorized to engage in manufacturing.
 - Section 273(e)(1) applies to "a [BOC] or any entity acting on its behalf; bars discrimination in favor of a BOC "affiliate" or "related person."
 - Section 273(e)(2) requires "[e]ach [BOC] or any entity acting on its behalf" to make procurement decisions based on an "objective assessment of price, quality, delivery, and other commercial factors."
 - Section 273(e)(5) provides that "a [BOC] and any entity it owns or otherwise controls" must protect proprietary information submitted in procurement process from unauthorized release.

Application to all BOCs is consistent with core purpose of Section 273, i.e. preservation of the competitive marketplace for equipment that has emerged under the MFJ. Section 273(e) provisions provide continuity, constrain potential for discrimination in BOC procurement following elimination of MFJ Section II.B. non-discrimination requirements.

- Non-Discrimination Requirements - Section 273(e)(1) requires BOCs and entities procuring for them to affirmatively consider products produced or supplied by "unrelated persons," and bars any form of discrimination in favor of a BOC "affiliate" or "related person." Section 273(e)(2) requires BOC purchasing decisions to be made in an unbiased manner, on the basis of an objective assessment of the relative merits of products manufactured by BOC affiliated and unaffiliated suppliers.
 - "Affiliate": defined in Section 3 of Communications Act
 - "Related Person": no statutory definition, but clearly encompasses broader class of entities than term "affiliate;" accordingly, TIA's proposed definition would include any BOC "affiliates," as well as any supplier in which a BOC has a "material financial interest" that gives it a direct, continuing share of the supplier's business or revenues.
 - "Equipment," "services," and "software": Consistent with the approach adopted w/r/t the Section 272(c)(1) non-discrimination provisions, the Commission should reject RBOC requests to narrow the scope of terms adopted in Section 273(e)(2), and thereby limit its effectiveness in constraining discriminatory procurement practices.

- Enforcement: TIA agrees with the Commission's observation (NPRM, Paragraph 69) concerning the inadequacy of traditional, complaint-based enforcement techniques, and urges the Commission to employ additional mechanisms to ensure compliance with statutory safeguards in procurement and other areas.
 - Compliance Plan: BOCs should be required to file and receive approval of plans similar to those required under Section II.C. of the MFJ, describing the standards/procedures which they will employ to meet their non-discrimination obligations under Section 273 and related provisions, e.g., Section 272(c)(1).
 - Reporting/Record Retention Requirements: To ensure availability of information needed to effectively monitor/enforce safeguards, BOCs should be required to:
 - 1) prepare/submit annual reports identifying the total value of BOC purchases from "affiliates" and other "related parties," in relation to overall purchases, in appropriately disaggregated product categories, and
 - 2) retain procurement-related documents for at least 2 years after the procurement process and any audit, investigation or other related proceeding has been completed.
 - Audit: Biannual audits required under Section 272(d) should include examination of compliance with Section 273 safeguards, as well as related Section 272 provisions, e.g. Section 272(c)(1).

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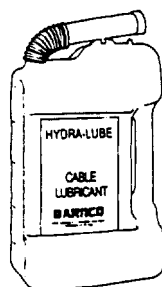
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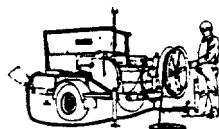
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Cases, Carrying, (Telephone)

Abacon Telecommunications
Drake Communication Products Inc
Plug-In Storage Systems Inc, PSSI
Samsonite Corp

Cases, Splice

AMP
Drake Communication Products Inc
GC Technologies
Klein Tools Inc
PlastiComm Industries Inc
PSI Telecom
Siecor Corp
Thomas & Betts
3M, Telecom Systems Div
Uruseal Communications Inc

CATV Equipment

ADC Telecommunications Inc
Allen Tel Products
Alpha Technologies
ANTEC Corp
Augat Communication Products Inc
Bosch Telecom Inc
Burdy Corp
Champion Products Inc
Charles Industries Ltd
The Courtney Co (TCC)

Elcom Technologies Corp
E/O Networks
GC Technologies
Harmonic Lightwaves
Hewlett-Packard Co
Inchcape Testing Services
ITW Linx
NORTEL (Northern Telecom)
PenCell Plastics
Quintech Electronics & Communications Inc (QEC)
RE America Inc
Ripley Co
Scientific-Atlanta Inc
Sumitomo Electric Lightwave Corp
Telec Inc
Toner Cable Equipment Inc
Trilogy Communications Inc
TV/COM
TV/COM International
Tyton Corp
Wavetek Corp
Weather Guard/Knaack Mfg Co

Cellular, Fixed

ASTRONET Corp
Celcore
Celwave
COMSAT RSI Plexsys Wireless Systems
Digital Technics Inc
DSC Communications Corp
Fortec Inc
Hazeltine Corp
Hughes Network Systems Inc
Inchcape Testing Services
InterDigital Communications Corp
Motorola Inc
NORTEL (Northern Telecom)
PSC Inc
QUALCOMM Inc
Steinbrecher Corp
Tadiran Telecommunications
Telesync Inc
Telular Corp
Trilogy Communications Inc

Cellular Mobile Station Equipment

AirTouch Communications
ASTRONET Corp
Celwave
COMSAT RSI Plexsys Wireless Systems
Geotek Communications Inc
Hewlett-Packard Co
InterDigital Communications Corp
Mitsubishi Consumer Electronics America Inc, CMT Group
Mobile International Co
Motorola Inc
MX-COM Inc
NewNet
Nokia Inc
NORTEL (Northern Telecom)
Odetics Inc/IDD
OKI Telecom
PCSI (Pacific Communication Sciences Inc)
Personal Telecommunications Technologies Inc
PSC Inc
QUALCOMM Inc
Steinbrecher Corp
TWR Communications Inc

Cellular MTSO

Alcatel Telecom
ASTRONET Corp
Burdy Corp
Celcore
COMSAT RSI Plexsys Wireless Systems
The Crown Divisions, (of The Allen Group)
DSC Communications Corp
Hughes Network Systems Inc
InterDigital Communications Corp
NACT
NEC America Inc
NORTEL (Northern Telecom)
Odetics Inc/IDD
Open Development Corp
Phoenix Wireless Group Inc
PSC Inc
QUALCOMM Inc
Redcom Laboratories Inc
Siemens Stromberg-Carlson
Tecknowledge Associates Inc
Tekelec
Texas Microsystems

Cellular Payphone

CEEEO (Communication Equipment & Engineering Co)
InterDigital Communications Corp
Phoenix Wireless Group Inc
Protel Inc
QUALCOMM Inc

Cellular Radio Switching & Control Equipment, Cell Site

AirNet Communications Corp
ASTRONET Corp
Augat Communication Products Inc
Badger Technology Inc
Burdy Corp
Celcore
Celwave
COMSAT RSI Plexsys Wireless Systems
Digital Technics Inc
Geotek Communications Inc
Hewlett-Packard Co
Hughes Network Systems Inc
Lockheed Sanders Inc
Motorola Inc
NEC America Inc
NewNet
NORTEL (Northern Telecom)
Odetics Inc/IDD
Peninsula Wireless Communications Inc
Phoenix Wireless Group Inc
Photonic Applications Inc
Premisys Communications Inc
PSC Inc

QUALCOMM Inc
Redcom Laboratories Inc
RELTEC Corp
Siemens Stromberg-Carlson
Steinbrecher Corp
Tecknowledge Associates Inc
3Com Corp
TWR Communications Inc
TWR Telecom Inc
Watkins-Johnson Co

Central Office Installation

ADC Telecommunications Inc
Applied Innovation Inc
Armor Communications Inc
C&D PowerCom, Div Charter Power Systems
Drake Communication Products Inc
GNB Technologies
Hekimian Laboratories Inc
Henkels & McCoy Inc
NORTEL (Northern Telecom)
PECO II Inc
RELTEC Corp
Telecommunications Power Systems Inc

Centrex Equipment

Digital Technics Inc
NEC America Inc
NORTEL (Northern Telecom)
Syntu Technologies Corp

Channel Banks

Abacon Telecommunications
ADTRAN
Advanced Fibre Communications
Charles Industries Ltd
Newbridge Networks Inc
NORTEL (Northern Telecom)
Pulsecom
RAD Data Communications
Siemens Stromberg-Carlson
Telco Systems Inc
Telecom Solutions, Div Symmetricom Inc
Teltrend Inc
XEL Communications

Channel Service Units

ADTRAN
Charles Industries Ltd
Moore Co
Newbridge Networks Inc
NORTEL (Northern Telecom)
Optelecom Inc
PairGain Technologies Inc
Pulsecom
RAD Data Communications
Verilink Corp

Chargers, Battery

Abacon Telecommunications
ADS The Power Resource Inc
Allen Telecom Group Inc
C&D PowerCom, Div Charter Power Systems
Charles Industries Ltd
The Courtney Co (TCC)
Hendry Telephone Products
La Marche Mfg Co
PECO II Inc
Power Conversion Products Inc
Power Suppliers Inc
RELM Communications Inc
RELTEC Corp
Telecommunications Power Systems Inc

Circuit Breakers

Abacon Telecommunications
Carlingswitch Inc
Hendry Telephone Products
PECO II Inc
Philips Technologies, Airpax Protector Group
Thomas & Betts
Warren Electric Telecommunication-Utility Co
Warren Power Systems

Circuits, Integrated

Echelon
MX-COM Inc
PCSI (Pacific Communication Sciences Inc)
Rockwell International Corp,
Telecommunications
Telitone Corp
Yamaha Systems Technology Inc

Clamps, Cable

Abacon Telecommunications
Burdry Corp
ITW Linx
Moore Co
Panduit Corp
PlastiComm Industries Inc
Primex Mfg Corp
Toner Cable Equipment Inc
Tyton Corp
Warren Electric Telecommunication-Utility Co

Cleaners, Cable

PlastiComm Industries Inc
Thomas & Betts
3M, Telecom Systems Div
Warren Electric Telecommunication-Utility Co

Clips, Bridging

DEK Inc
Industrial Technology Inc
ITW Linx
Moore Co

Siemon Co
Suttle Apparatus/CSI
Warren Electric Telecommunication-Utility Co

Clips, Test

Abacon Telecommunications
BECO Mfg Corp
Industrial Technology Inc
Industrial Technology Inc
Klein Tools Inc
Metro Tel Corp
Siemon Co

Clock Systems

Datum
Larus Corp
Telecom Solutions, Div Symmetricom Inc

Closures, Splice Case

ACT Comm Inc
AMP
ANTEC Corp
AXSYS Communications
Fibertron Corp
GC Technologies
Keptel Inc
PenCell Plastics
PlastiComm Industries Inc
Primex Mfg Corp
PSI Telecom
RELTEC Corp
Siecor Corp
Telect Inc
Thomas & Betts
3M, Telecom Systems Div
Toner Cable Equipment Inc
Urseal Communications Inc
Warren Electric Telecommunication-Utility Co

Closures, Vault

ACT Comm Inc
ANTEC Corp
Keptel Inc
PenCell Plastics
PSI Telecom
RELTEC Corp
Thomas & Betts
3M, Telecom Systems Div
Urseal Communications Inc
Warren Electric Telecommunication-Utility Co

Coils, Choke, Hybrid, Loading, Repeating

Abacon Telecommunications
Larus Corp
SNC Mfg Co

Coin Telephone Accessories

Abacon Telecommunications
BECO Mfg Corp
CEECO (Communication Equipment & Engineering Co)
Clark Specialty Co
Inchcape Testing Services
Independent Technologies Inc
Protel Inc

Coin Telephone Conversion Kits

BECO Mfg Corp
Inchcape Testing Services
Independent Technologies Inc
Protel Inc

Computer Aided Design Systems

C-TEL Corp
ESRI Inc, (Environmental Systems Research Institute)
Henkels & McCoy Inc
Hewlett-Packard Co
IntegraTRAK Inc
PSC Inc
Sheltech Inc
Sun Microsystems Computer Co

Computer Products

Cerulean Technology Inc
Communications Mfg Co (CMC)
Cresta Systems Inc
Digi International Inc
Drake Communication Products Inc
Energy Transformation Systems Inc
Hewlett-Packard Co
InfoCom Corp
Methode Electronics Inc
Microtest Inc
Moore Co
Motorola Inc
PlastiComm Industries Inc
PSC Inc
Quintrex Data Systems
Rockwell International Corp, Telecommunications
Sheltech Inc
Sierra Semiconductor
Sun Microsystems Computer Co
Syntu Technologies Corp
Test Technology Inc
Texas Microsystems
Z-Microsystems Inc

Computers, Special Purpose

Applied Innovation Inc
Consultronics
ECI Telecom Inc

Harris Network Support Products
Hewlett-Packard Co
InfoCom Corp
PSC Inc
Sun Microsystems Computer Co
Syntu Technologies Corp
Tekno Industries Inc
Texas Microsystems

Computing Services

DSET Corp
EDS Personal Communications Corp
Hewlett-Packard Co
MIS Labs
PSC Inc
Sun Microsystems Computer Co
System Studies Inc

Concentrators, Line

Abacon Telecommunications
Applied Innovation Inc
Fibertron Corp
NORTEL (Northern Telecom)
PSC Inc
RAD Data Communications
Seiscor Technologies Inc

Conduit & Fittings

ARNCO Corp

Smooth-Cor™ Conduit

Outperforms solid-wall PVC duct. Corrugated outer wall is flexible so it is easily formed to change line and grade without sweeps and bends. Smooth inner wall provides rigidity and makes cable pulling easier. Easily connects to PVC Duct. Meets ASTM and utility standards.

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PlastiComm Industries Inc
Pyramid Industries Inc
Thomas & Betts
Warren Electric Telecommunication-Utility Co

Conduit Installers

AXSYS Communications
Henkels & McCoy Inc
PlastiComm Industries Inc
RELTEC Corp

Connector Cable & Cords

Abacon Telecommunications
Adirondack Wire & Cable
Allen Tel Products
AMP
Augat Communication Products Inc
Burndy Corp
ICC (International Connectors & Cable Corp)
Leviton Telecom
Moore Co
Ortronics Inc
Panduit Corp
PlastiComm Industries Inc
Sheltech Inc
Siemon Co
Telect Inc
Thomas & Betts
3M, Telecom Systems Div
Toner Cable Equipment Inc
Uraseal Communications Inc
Vari-Tronics Co
Virginia Plastics Co
Warren Electric Telecommunication-Utility Co

Connectors, Coaxial Cable

Abacon Telecommunications
ADC Telecommunications Inc
Allen Telecom Group Inc
AMP
ANTEC Corp
Augat Communication Products Inc
Berg Electronics Inc
Calwave
Gilbert Engineering Co
Leviton Telecom
Moore Co
Ortronics Inc
Panduit Corp
PlastiComm Industries Inc
RELTEC Corp
Sheltech Inc
Toner Cable Equipment Inc
Trilogy Communications Inc
Trompeter Electronics Inc
Uraseal Communications Inc
Vari-Tronics Co
Warren Electric Telecommunication-Utility Co

Connectors, Drop Wire

Abacon Telecommunications
AMP
Burndy Corp
Gilbert Engineering Co
KRONE Inc
Leviton Telecom
PSI Telecom
RELTEC Corp
Sheltech Inc
Siemon Co
Toner Cable Equipment Inc
Uraseal Communications Inc
Vari-Tronics Co